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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

VIA TELEFAX AND  
CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

July 10, 1998

Denny Clinton  
Johns-Manville Corporation  
10100 West Ute Avenue  
Littleton, CO 80127

Dear Mr. Clinton:

The U.S. Environmental Protection Agency (EPA), Illinois EPA, and Illinois Department of Natural Resources (DNR) have reviewed the April 3, 1998 "Characterization Plan for Additional Sites" (the Plan) for the Johns-Manville Site in Waukegan, Illinois and hereby provide approval, with modifications listed below, for Tasks 4 through 6 for Sites 2 and 3. The modifications are as follows:

Site 2:

Using information collected regarding the configuration of the former shooting range, a 100 foot grid shall be layed out across Site 2. Sampling shall be conducted at the points of intersection of the grid. Borings shall be made at one foot depth intervals to a total depth of three feet at each sampling location. Samples shall be visually inspected. If any boring interval contains visible asbestos-containing material (ACM), no analyses for asbestos need to be conducted for that boring location. If no boring intervals contain visible ACM, then all three boring intervals at that grid location shall be analyzed for bulk asbestos. The top interval at each sampling location shall be analyzed for total lead, and two intervals (total) shall be analyzed for TCLP lead. The TCLP samples shall be selected based on visual observations (i.e. the intervals with the greatest quantity of lead bearing debris, such as bullet fragments). Every attempt shall be made to have representative grid samples collected in the areas where trenches or berms previously existed; grid points may be moved slightly in the field to achieve this goal.

Site 3:

Using information collected to date regarding Site 3, a 50 foot grid shall be layed out across Site 3. Sampling shall be conducted at the points of intersection of the grid. Borings shall be made at



one foot depth intervals to a total depth of three feet at each location. Samples shall be visually inspected. If any boring interval contains visible ACM, no analyses need to be conducted for that boring location. If no boring intervals contain ACM, then all three boring intervals at that grid location shall be analyzed for bulk asbestos.

Site 2 and Site 3:

1. At least 14 days prior to collecting any samples at Sites 2 and 3, Johns-Manville shall specify to EPA, Illinois EPA, and Illinois DNR (the agencies), in writing, which labs they will be using for asbestos and lead analyses.
2. Johns-Manville shall complete all sampling activities outlined above and submit preliminary analytical results to the agencies within 90 days of your receipt of this letter (this hereby amends the schedule stated in my March 20, 1998 letter to you).
3. Johns-Manville shall submit the written report for Sites 2 and 3 described in Task 5 of the Plan to the agencies within 105 days of your receipt of this letter.
4. Johns-Manville shall arrange the meeting for Sites 2 and 3 described in Task 6 of the Plan with the agencies within 120 days of your receipt of this letter.
5. The ACM generated as part of Task 4 for Sites 2 and 3 may be disposed of in the Settling Basin; if Johns-Manville plans to dispose of this ACM in a different manner, the agencies must be notified at least 30 days prior to the onset of said disposal.

The work contemplated under the Plan is not inconsistent with the applicable requirements of the National Contingency Plan, 40 CFR Part 300. If you have any questions concerning this letter, please contact me at (312) 886-4742.

Sincerely,



Brad Bradley  
Remedial Project Manager

cc: Bob Rogers, Illinois EPA  
Beth Wallace, Illinois AG  
Randy Heidorn, Illinois Nature Preserves Commission  
Steve Davis, Illinois DNR  
Jeff Diver, rep. City of Waukegan